

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

**JTH TAX, INC. d/b/a LIBERTY TAX  
SERVICE,**

**Plaintiff,**

**Civil No. 2:07cv170**

**v.**

**KENYA WHITAKER AND  
EASY SOFTWARE SOLUTIONS, LLC.,**

**Defendants.**

**PLAINTIFF'S MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION TO  
TRANSFER VENUE OR STAY THE PROCEEDINGS**

Plaintiff, JTH Tax, Inc. d/b/a Liberty Tax Service, adopts and incorporates by reference its previously filed Memorandum in Opposition to Defendant's Motion to Transfer Venue or Stay the Proceedings and supporting Declarations in response to Defendant Easy Software Solutions, LLC's Motion to Transfer Venue or Stay the Proceedings.

**JTH Tax, Inc. d/b/a Liberty Tax Service**

By: \_\_\_\_\_ /s/  
Counsel

Vanessa M. Szajnoga, Esq. (VSB #71500)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of June 2007, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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\_\_\_\_\_  
/s/

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